

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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STEPHANIE N. EVERETT,

Plaintiff, **DECLARATION OF KAREN K.  
RHAU IN SUPPORT OF  
DEFENDANTS' MOTION TO  
DISMISS THE COMPLAINT**

-against-

NEW YORK CITY DEPARTMENT OF  
EDUCATION; KATINA YESNICK; ANGELA LISO

No. 21 CV 07043 (JPC)

Defendants.

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**KAREN K. RHAU** declares, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following is true and correct.

1. I am an Assistant Corporation Counsel in the office of Georgia M. Pestana, Corporation Counsel of the City of New York, attorney for defendants New York City Department of Education (“DOE”), Katina Yesnick, and Angela Liso, (collectively, “Defendants”) in the above-captioned action. This declaration is submitted in support of Defendants’ motion to dismiss, pursuant to Rule 12 (b) of the Federal Rules of Civil Procedure, dismissing the Complaint in its entirety.

2. Annexed to this declaration as Exhibit “A” is a true and correct copy of Plaintiff’s Verified State Division of Human Rights Complaint, Case No. 10210583.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
January 28, 2022

*/s/ Karen K. Rhau*

Karen K. Rhau  
Assistant Corporation Counsel